



\*Admitted in New York  
District of Columbia

Application granted, but the Court will not grant any further extension requests, including for settlement purposes. The conference currently set for July 12 is hereby adjourned to September 30, 2024, at 11:00 AM.

May 29, 2024

The Clerk of Court is directed to terminate the motion at Dkt. 13 and stay this case.

**VIA ECF**

Hon. Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.

Date: May 31, 2024

Re: *Littman Krooks LLP, et al., v. N.Y.C. Dep't. of Educ.*, 24-cv-2685 (AS)

Dear Judge Subramanian:

We represent Defendant in the above-referenced action wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400, *et seq.*, as well as for this action.

We write on behalf of the parties to request a 120-day stay of this matter until September 25, 2024 and an extension of time to file an answer to the Complaint for the duration of the stay from May 29, 2024 to September 25, 2024. Defendant apologizes for the lateness of this request (not having complied with Your Honor's two-business day rule) and for the inconvenience to the Court. This is the parties' first request for a stay and Defendant's first request for an extension of time to file an answer. Plaintiffs consent and join these requests. A 120-day stay should allow Defendant's counsel time to complete the internal review process for all 18 matters—it typically takes upwards of 90 days for a *single* matter to be resolved—by analyzing the billing records together with the underlying administrative records, engage in settlement negotiations, and hopefully reach agreements in each matter.

We note that we have settled all previous mass Littman Krooks filings like this one in the past and remain optimistic that this matter can be fully resolved without the Court's intervention. We further note that 95% of the IDEA claims commenced against the N.Y.C. Department of Education settle without the need to burden the Court with any motion practice or conferences and often without the need to file a response to the Complaint. The parties are optimistic they will be able to fully resolve this matter through settlement without further intervention from the Court.

Accordingly, the parties respectfully request a 120-day stay of this matter in order to facilitate settlement to September 25, 2024, with a status letter due that same day advising the Court on the progress of settlement discussions and proposing next steps, if any are needed.

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Thank you for considering these requests.

Respectfully Submitted,

By: /s/ Vivian Rivera Drohan  
Vivian Rivera Drohan, Esq.

cc: Arshi Pal, Esq. (via ECF)